

EXHIBIT B

BRIAN WHELAN 256534
(brian@whelanlawgroup.com)
WHELAN LAW GROUP
1827 E. Fir Ave. #110
Fresno, California 93720
Telephone: (559) 437-1079
Facsimile: (559) 437-1720

WILLIAM K. NELSON 279450
(wnelson@sierraplalaw.com)
MARK D. MILLER 116349
(mmiller@sierraplalaw.com)
SIERRA IP LAW, PC
A Professional Corporation
7030 N. Fruit Ave., Suite 110
Fresno, California 93711
Post Office Box 5637
Fresno, California 93755-5637
Telephone: (559) 436-3800
Facsimile: (559) 436-4800

Attorneys for Plaintiffs
BEAUMONT RV, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

* * *

BEAUMONT RV, INC.,
a California Corporation,

Plaintiff,

v.

CARBON EMERY RV, INC., a Utah
Corporation.

Defendant.

Case No. 1:22-CV-00073-AWI-HBK

**DECLARATION OF MARK D. MILLER
IN SUPPORT OF PLAINTIFF'S
MOTION FOR ADMINISTRATIVE
RELIEF TO ALLOW LATE FILING OF
PAPERS IN OPPOSITION TO
DEFENDANT'S MOTION TO DISMISS**

Complaint Filed: January 17, 2022

I, Mark D. Miller, declare:

1. I am an attorney at law duly licensed to practice before all of the courts of the state of California and before this District, and am a member of the law firm of Sierra IP Law, PC, attorneys for plaintiff BEAUMONT RV, INC. ("Beaumont").

3 On April 5, 2022, I learned for the first time that Local Rule 230(c) had changed, and that the deadline for filing the opposition was actually fourteen (14) days after the filing date of the Motion to Dismiss, which would have been April 4, 2022. I was unaware of the change in Local Rule 230(c) before April 5, and only then realized that we had inadvertently calendared the wrong response date.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct; that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and that this declaration was executed this 6th day of April, 2022, at Fresno, California.

/s/ *Mark D. Miller*
 Mark D. Miller